

1
2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 Carina Perez, individually, and as
12 surviving heir and successor in interest
of OSCAR VASQUEZ PEREZ,

13 Plaintiff,

14 vs.

15 AUTO TECHNOLOGY COMPANY,
16 an Ohio corporation; and DOES 1
through 100, inclusive,

17 Defendants.
18
19

Case No. CV13-06728-MMM (VBKx)

**~~[PROPOSED]~~ ORDER GRANTING
STIPULATION AND PROTECTIVE
ORDER RE CONFIDENTIAL
INFORMATION PRODUCED BY THIRD
PARTY PRIME WHEEL**

20 WHEREAS, the parties in the above matter, CARINA PEREZ, individually, and as
21 surviving heir and successor in interest of OSCAR VASQUEZ PEREZ (“Perez”), Plaintiff, and
22 AUTO TECHNOLOGY COMPANY (“Auto Tech”), Defendant, on the one hand, and third-
23 party PRIME WHEEL CORPORATION (“Prime Wheel) on the other hand (hereinafter
24 collectively referred to as the “Parties”), have agreed that certain documents produced by Prime
25 Wheel in response to subpoenas in this matter and videos and photographs generated in relation
26 to site inspections conducted at Prime Wheel’s facility may contain proprietary and/or
27 confidential information and as such will be used for purposes of litigation only relating to the
28 matter of Perez v. Auto Technology, Inc., et al. The Parties understand that from time to time,

1 documents produced from Prime Wheel will be filed with the court and/or used as exhibits and
2 that those documents will be public record.

3
4 Dated: May 13, 2015
5

6 By: /s/
7 UNITED STATES MAGISTRATE JUDGE
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE